

1 Theodore Lenall Copeland  
2 12411 Beverly Ct. SW #6-I  
3 Lakewood, WA 98499  
4 Telephone (253) 582-4866  
5 Pro se

FILED  
21 mc  
2010 JUL 22 AM 7:04  
CLERK  
U.S. DISTRICT COURT  
DISTRICT OF WA AT TACOMA  
BY \_\_\_\_\_ CLERK

HONORABLE ELIZABETH L. PERRIS  
Chapter 13 Proceeding  
Tacoma, WA

8 UNITED STATES BANKRUPTCY COURT  
9 DISTRICT OF WESTERN WASHINGTON

10 In re:

11 THEODORE L. COPELAND

12 Debtor.

CASE NO. 08-45008-ELP  
Chapter 13

ADVERSARY NO. 10-04026-ELP

13 THEODORE L. COPELAND

14 Plaintiff,

15 EMIEL A. KANDI and his MARITAL  
16 COMMUNITY, DIVERSIFIED  
17 FINANCIAL, INC., and JASON M.  
18 WONG

Defendants.

PLAINTIFF'S ACCOUNTING OF  
INCURRED LEGAL FEES

19 Plaintiff Theodore L. Copeland submits the following legal fees as damages:

20 \$38,647.66. Breakdown of fees are attached as **Exhibit A**.

21 **DATED** this 21<sup>st</sup> day of July, 2010.

22  
23  
24   
25 Theodore L. Copeland, Plaintiff, Pro se  
26

Theodore Lenall Copeland  
12411 Beverly Ct. SW #6-I  
Lakewood, WA 98499  
Telephone (253) 582-4866  
Pro se

# EXHIBIT A

	DATE	WORK DONE	WORKER	HOURS BILLED	AMOUNT BILLED	ADJUSTM ENTS	AMOUNT CLAIMED AS DAMAGES
1	10/7/2008	FIRST MEETING	MB	0.80	\$180.00	100%	\$180.00
2	10/8/2008	Conduct further research	MB	0.60	\$135.00	100%	\$135.00
3	10/9/2008	Phone conference	MB	0.30	\$67.50	100%	\$67.50
4	10/13/2008	admin	VM	1.50	\$202.50	100%	\$202.50
5	10/13/2008	Draft complaint, motion to set aside and dictation motion	MB	3.20	\$720.00	100%	\$720.00
6	10/14/2008	Transcribe motion and order	VM	1.80	\$243.00	100%	\$243.00
7	10/14/2008	Revise complain. Research bankruptcy issue	MB	2.10	\$472.50	100%	\$472.50
8	10/15/2008	Transcribe declarations, complaint and motion	VM	1.00	\$135.00	100%	\$135.00
9	10/15/2008	research bankruptcy issues	MB	1.20	\$270.00	100%	\$270.00
10	10/17/2008	Made changes. Met with Copeland	VM	2.50	\$337.50	100%	\$337.50
11	10/17/2008	Finish draft	MB	1.20	\$270.00	100%	\$270.00

<b>12</b>	10/17/2008	recording fee			\$46.00	100%	\$46.00
<b>13</b>	10/17/2008	filing fee			\$200.00	100%	\$200.00
<b>14</b>	10/24/2008	copies 68@ \$0.15	copies		\$10.20	100%	\$10.20
<b>15</b>	10/30/2008	renote motion for nov.21. Mailed doc to Wong	VM	0.70	\$94.50	100%	\$94.50
<b>16</b>	10/30/2008	Service issues. Call with Copeland.Call with Kandi. Talk to staff	MB	0.60	\$135.00	100%	\$135.00
<b>17</b>	10/31/2008	Service related work	VM	0.55	\$74.25	100%	\$74.25
<b>18</b>	10/31/2008	process servive fee			\$70.00	100%	\$70.00
<b>19</b>	11/4/2008	Transcribe letters to Spencer and Wong	VM	1.50	\$202.50	100%	\$202.50
<b>20</b>	11/4/2008	Work on responsive documents.	MB	1.75	\$393.75	100%	\$393.75
<b>21</b>	11/14/2008	parking fee			\$5.00	100%	\$5.00
<b>22</b>	11/5/2008	Work on reply brief	MB	0.45	\$101.25	100%	\$101.25
<b>23</b>	11/7/2008	Work on reply brief as to motion to disqualify	MB	0.70	\$157.50	100%	\$157.50
<b>24</b>	11/11/2008	Transcribe declar. Of burns.	VM	1.80	\$243.00	100%	\$243.00

<b>25</b>	11/11/2008	Draft response to attempt to force a conflict	MB	1.30	\$292.50	100%	\$292.50
<b>26</b>	11/12/2008	worked on Elliott declar. Worked on binder for motion hearing	VM	2.00	\$270.00	100%	\$270.00
<b>27</b>	11/12/2008	Worked on Sukhia declaration	DSM	0.30	\$42.00	100%	\$42.00
<b>28</b>	11/12/2008	Worked on Declaration on Spencer's docs.sealed docs	DSM	0.20	\$28.00	100%	\$28.00
<b>29</b>	11/12/2008	Finalize docs for filing	MB	1.00	\$225.00	100%	\$225.00
<b>30</b>	11/13/2008	finalize declration regarding docs received from Marla Spencer	DSM	0.25	\$35.00	100%	\$35.00
<b>31</b>	11/13/2008	Review of reply concerning disqualification of counsel & prep for court	MB	0.40	\$90.00	100%	\$90.00
<b>32</b>	11/14/2008	Revision order for motion	VM	0.30	\$40.50	100%	\$40.50
<b>33</b>	11/14/2008	Prepare for court; Court appearance: Call to Client to discuss case	MB	3.20	\$720.00	100%	\$720.00
<b>34</b>	11/19/2008	Work on reply/new motion	MB	2.90	\$652.50	100%	\$652.50
<b>35</b>	11/20/2008	Called Judge Steiner's JA to strike hearing.Lwetter to wong.Call to Wong	VM	0.90	\$121.50	100%	\$121.50
<b>36</b>	11/24/2008	Receive email from Copeland with proof of \$460 sent to sutherland june 3rd 2008	SG	0.30	\$47.25	100%	\$47.25
<b>37</b>	11/24/2008	called to get transcript for nov 14 hearing	SG	0.30	\$47.25	100%	\$47.25

<b>38</b>	11/25/2008	revised motion.Revise complaint	VM	0.20	\$27.00	100%	\$27.00
<b>39</b>	11/25/2008	review client email; review Kandi's motion for relief from stay. Revised our motion	MB	0.75	\$168.75	100%	\$168.75
<b>40</b>	11/25/2008	copying,mailing expenses			\$55.30	100%	\$55.30
<b>41</b>	11/25/2008	Finance charge			\$24.24	100%	\$24.24
<b>42</b>	12/3/2008	talked to court reporter about transcripts	SG	0.20	\$31.50	100%	\$31.50
<b>43</b>	12/3/2008	talked to court reporter about transcripts	SG	0.10	\$15.75	100%	\$15.75
<b>44</b>	12/4/2008	Update pleading, discovery & bankruptcy indexes:	VM	1.25	\$168.75	100%	\$168.75
<b>45</b>	12/4/2008	transcript fee			\$144.00	100%	\$144.00
<b>46</b>	12/9/2008	Received email or Canty's declaration	SG	0.20	\$31.50	100%	\$31.50
<b>47</b>	12/10/2008	Transcribe memorandum regarding bankruptcy response	VM	1.10	\$148.50	100%	\$148.50
<b>48</b>	12/10/2008	Discuss issues of bankruptcy and how it impact state case	MB	1.30	\$292.50	100%	\$292.50
<b>49</b>	12/10/2008	recieved email about bankruptcy reponse	SG	0.10	\$15.75	100%	\$15.75
<b>50</b>	12/11/2008	answers to interrogatories	MB	2.20	\$495.00	100%	\$495.00

<b>51</b>	12/25/2008	copies postage			\$17.54	100%	\$17.54
<b>52</b>	12/25/2008	Finance charge			\$112.69	100%	\$112.69
<b>53</b>	1/16/2009	total work			\$810.63	100%	\$810.63
<b>54</b>	1/16/2009				\$0.00	100%	\$0.00
<b>55</b>	1/16/2009	Finance charge			\$106.67	100%	\$106.67
<b>56</b>	2/11/2009	Added Marla Spencer to complaint	SG	1.80	\$283.50	100%	\$283.50
<b>57</b>	2/12/2009	Added Marla Spencer to complaint	MB	0.40	\$90.00	100%	\$90.00
<b>58</b>	2/12/2009	letter to Wong re: adding Spencer	SG	1.25	\$196.88	100%	\$196.88
<b>59</b>	2/13/2009	communication with Wong	SG	0.70	\$110.25	100%	\$110.25
<b>60</b>	2/20/2009	phone call to copeland	MB	0.50	\$112.50	100%	\$112.50
<b>61</b>	2/20/2009	copying postage			\$30.67	100%	\$30.67
<b>62</b>	3/12/2009	call with Copeland about upcoming bankruptcy hearing	MB	0.30	\$67.50	100%	\$67.50
<b>63</b>	3/16/2009	Meet with client review case discuss strategy	MB	1.30	\$292.50	100%	\$292.50

<b>64</b>	3/25/2009	copies			\$2.40	100%	\$2.40
<b>65</b>	3/25/2009	finanace charge			\$144.72	100%	\$144.72
<b>66</b>	3/26/2009	Phone call with Wong. Meet with client. Research concerns re: forfeiture	MB	0.90	\$202.50	100%	\$202.50
<b>67</b>	3/30/2009	letter to Wong re: forfeiture	SG	0.30	\$47.25	100%	\$47.25
<b>68</b>	4/14/2009	witness list work	SG	1.50	\$236.25	100%	\$236.25
<b>69</b>	4/15/2009	recivied email about Lopez & Marsh	SG	0.30	\$47.25	100%	\$47.25
<b>70</b>	4/15/2009	witness list work	SG	0.40	\$63.00	100%	\$63.00
<b>71</b>	4/15/2009	witness list work	SG	0.60	\$94.50	100%	\$94.50
<b>72</b>	4/15/2009	email from client	SG	0.10	\$15.75	100%	\$15.75
<b>73</b>	4/17/2009	witness list work	SG	0.80	\$126.00	100%	\$126.00
<b>74</b>	4/17/2009	call from Wong	SG	0.10	\$15.75	100%	\$15.75
<b>75</b>	4/17/2009	review witness list	MB	0.30	\$67.50	100%	\$67.50
<b>76</b>	4/25/2009	copying postage			\$15.97	100%	\$15.97



<b>77</b>	4/25/2009	Finance charge			\$152.11	100%	\$152.11
<b>78</b>	4/28/2009	deal with motion of Wong	MB	0.20	\$45.00	100%	\$45.00
<b>79</b>	4/28/2009	check status of ch 13. Work or special counsel for Copeland	SG	0.20	\$31.50	100%	\$31.50
<b>80</b>	4/28/2009	work seeking bankruptcy approval to rep. Copeland	SG	1.50	\$236.25	100%	\$236.25
<b>81</b>	4/29/2009	reviewed Interrogatories & notice of deposition from Wong	SG	0.20	\$31.50	100%	\$31.50
<b>82</b>	4/29/2009	work on interrogatories from Wong	SG	0.30	\$47.25	100%	\$47.25
<b>83</b>	4/29/2009	adjust trial date	SG	0.20	\$31.50	50%	\$15.75
<b>84</b>	4/29/2009	Work on appointing special counsel. Work on Kandi March 31 notice of intent	SG	1.50	\$236.25	50%	\$118.13
<b>85</b>	5/4/2009	Review interrogatories & bankruptcy docs. Extensive research to drafting appropriate pleading(restrain sale)	MB	2.40	\$540.00	100%	\$540.00
<b>86</b>	5/5/2009	work on case	SG	7.80	\$1,228.50	25%	\$307.13
<b>87</b>	5/6/2009	discovery issues	MB	1.70	\$382.50	50%	\$191.25
<b>88</b>	5/6/2009	work on case	SG	4.40	\$693.00	25%	\$173.25
<b>89</b>	5/7/2009	work on case	SG	2.90	\$456.75	25%	\$114.19

<b>90</b>	5/14/2009	summary judgement work	MB	0.50	\$112.50	100%	\$112.50
<b>91</b>	5/14/2009	summary judgement work	SG	1.10	\$173.25	100%	\$173.25
<b>92</b>	5/19/2009	forfeiture action	JB	3.50	\$700.00	100%	\$700.00
<b>93</b>	5/19/2009	restrain forfeiture	SG	0.70	\$110.25	100%	\$110.25
<b>94</b>	5/21/2009	case work	SG	0.70	\$110.25	100%	\$110.25
<b>95</b>	5/21/2009	summary judgement work	JB	4.00	\$800.00	100%	\$800.00
<b>96</b>	5/22/2009	prep for deposition	JB	0.95	\$190.00	100%	\$190.00
<b>97</b>	5/25/2009	meeting w/ client	MB	0.95	\$213.75	100%	\$213.75
<b>98</b>	5/26/2009	deposition	JB	2.50	\$500.00	100%	\$500.00
<b>99</b>	5/27/2009	summary judgement work	JB	4.20	\$840.00	100%	\$840.00
<b>100</b>	5/27/2009	summary judgement work	SG	1.50	\$236.25	100%	\$236.25
<b>101</b>	5/28/2009	motion to restrain forfeiture	JB	3.60	\$720.00	100%	\$720.00
<b>102</b>	5/28/2009	case work	SG	5.20	\$819.00	50%	\$409.50

<b>103</b>	5/28/2009	summary judgement work listen to judge Snyder hearing	MB	0.90	\$202.50	100%	\$202.50
<b>104</b>	5/29/2009	case work	SG	4.60	\$724.50	50%	\$362.25
<b>105</b>	5/29/2009	summary judgement work	MB	1.90	\$427.50	100%	\$427.50
<b>106</b>	6/1/2009	forfeiture action	JB	2.60	\$520.00	100%	\$520.00
<b>107</b>	6/1/2009	forfeiture action	SG	3.80	\$598.50	100%	\$598.50
<b>108</b>	6/1/2009	case work	MB	4.20	\$945.00	100%	\$945.00
<b>109</b>	6/3/2009	case work	SG	0.60	\$94.50	100%	\$94.50
<b>110</b>	6/3/2009	case work	MB	0.30	\$67.50	100%	\$67.50
<b>111</b>	6/5/2009	forfeiture action	SG	2.80	\$441.00	100%	\$441.00
<b>112</b>	6/5/2009	discovery request from wong	MB	0.80	\$180.00	100%	\$180.00
<b>113</b>	6/8/2009	summary judgement work	JB	1.30	\$260.00	100%	\$260.00
<b>114</b>	6/8/2009	motion to support stay	VM	1.00	\$135.00	100%	\$135.00
<b>115</b>	6/8/2009	summary judgement work	SG	1.00	\$157.50	100%	\$157.50

<b>116</b>	6/8/2009	reply to support stay	MB	2.30	\$517.50	100%	\$517.50
<b>117</b>	6/9/2009	work on reply	MB	0.75	\$168.75	100%	\$168.75
<b>118</b>	6/10/2009	restrain forfeiture	JB	3.20	\$640.00	100%	\$640.00
<b>119</b>	6/10/2009	restrain forfeiture	SG	4.70	\$740.25	100%	\$740.25
<b>120</b>	6/10/2009	reply to support stay	MB	0.40	\$90.00	100%	\$90.00
<b>121</b>	6/11/2009	prep hearing	JB	1.50	\$300.00	100%	\$300.00
<b>122</b>	6/12/2009	court appearance	JB	1.50	\$300.00	100%	\$300.00
<b>123</b>	6/15/2009	forfeiture action	SG	0.60	\$94.50	100%	\$94.50
<b>124</b>	6/19/2009	strategies	JB	0.50	\$100.00	100%	\$100.00
<b>125</b>	6/19/2009	reconsideration motion	MB	0.50	\$112.50	100%	\$112.50
<b>126</b>	6/22/2009	reconsideration motion	VM	1.00	\$135.00	100%	\$135.00
<b>127</b>	6/22/2009	reconsideration motion	JB	0.80	\$160.00	100%	\$160.00
<b>128</b>	6/10/2009	copying			\$194.00	100%	\$194.00

<b>129</b>	6/3/2009	Finance charge			\$267.73	50%	\$133.87
<b>130</b>	6/29/2009	reconsideration motion	SG	0.20	\$31.50	100%	\$31.50
<b>131</b>	6/30/2009	reconsideration motion	SG	0.40	\$63.00	100%	\$63.00
<b>132</b>	6/30/2009	reconsideration motion	MB	0.35	\$78.75	100%	\$78.75
<b>133</b>	7/1/2009	reconsideration motion	SG	0.60	\$94.50	100%	\$94.50
<b>134</b>	7/9/2009		SG	0.10	\$15.75	100%	\$15.75
<b>135</b>	7/13/2009	reconsideration motion	SG	0.30	\$47.25	100%	\$47.25
<b>136</b>	7/16/2009	rogatories from wong	JB	1.50	\$300.00	100%	\$300.00
<b>137</b>	7/16/2009	reconsideration motion	SG	0.60	\$94.50	100%	\$94.50
<b>138</b>	7/17/2009	reconsideration motion	SG	0.30	\$47.25	100%	\$47.25
<b>139</b>	7/17/2009	prep for court	MB	3.10	\$697.50	100%	\$697.50
<b>140</b>	7/22/2009	case work	JB	1.30	\$260.00	100%	\$260.00
<b>141</b>	7/24/2009	case work	JB	0.60	\$120.00	100%	\$120.00

<b>142</b>	6/26/2009	copying			\$266.85	100%	\$266.85
<b>143</b>	7/16/2009	Finance charge			\$532.40	70%	\$372.68
<b>144</b>	7/28/2009	case work	MB	0.80	\$180.00	100%	\$180.00
<b>145</b>	8/6/2009	sprint records	MB	0.60	\$135.00	100%	\$135.00
<b>146</b>	8/12/2009	sprint records	SG	0.50	\$78.75	100%	\$78.75
<b>147</b>	8/12/2009	bk issues	MB	0.30	\$67.50	100%	\$67.50
<b>148</b>	8/24/2009	Finance charge			\$576.51	70%	\$403.56
<b>149</b>	9/1/2009	case work	SG	1.00	\$157.50	100%	\$157.50
<b>150</b>	9/2/2009	case work	SG	0.50	\$78.75	100%	\$78.75
<b>151</b>	9/2/2009	read emails	MB	0.40	\$90.00	100%	\$90.00
<b>152</b>	9/4/2009	dismiss J kandi	MB	2.10	\$472.50	100%	\$472.50
<b>153</b>	9/9/2009		VM	1.00	\$135.00	100%	\$135.00
<b>154</b>	9/10/2009	reconsideration motion	SG	0.90	\$141.75	100%	\$141.75

<b>155</b>	9/10/2009	prep for hearing	MB	0.20	\$45.00	100%	\$45.00
<b>156</b>	9/11/2009	court appearance	MB	2.30	\$517.50	100%	\$517.50
<b>157</b>	9/14/2009	case work	SG	1.10	\$173.25	50%	\$86.63
<b>158</b>	9/15/2009	case work	SG	3.20	\$504.00	50%	\$252.00
<b>159</b>	9/15/2009	dismiss J kandi	MB	2.40	\$540.00	100%	\$540.00
<b>160</b>	9/16/2009	dismiss J kandi	SG	1.10	\$173.25	50%	\$86.63
<b>161</b>	9/16/2009	opposition brief	MB	1.20	\$270.00	100%	\$270.00
<b>162</b>	9/21/2009	case work	SG	1.10	\$173.25	100%	\$173.25
<b>163</b>	9/21/2009	response	MB	0.50	\$112.50	50%	\$56.25
<b>164</b>	9/25/2009	copying. Courier service			\$235.95	100%	\$235.95
<b>165</b>	9/25/2009	Finance charge			\$591.28	75%	\$443.46
<b>166</b>	10/9/2009	Finance charge			\$674.95	70%	\$472.47
<b>167</b>	11/9/2009	Finance charge			\$705.72	60%	\$423.43

<b>168</b>	11/30/2009	Finance charge			\$737.83	60%	\$442.70
<b>169</b>	1/8/2010	Finance charge			\$760.04	60%	\$456.02
<b>170</b>	2/25/2010	Finance charge \$31,733 at 16 percent			\$507.73	100%	\$507.73
<b>171</b>	3/25/2010	Finance charge			\$515.86	100%	\$515.86
<b>172</b>	4/25/2010	Finance charge at 16%			\$524.12	100%	\$524.12
<b>173</b>	5/25/2010	Finance charge at 16%			\$532.51	100%	\$532.51
<b>174</b>	6/7/2010	Tom Quinlan request	SG	0.80	\$126.00	100%	\$126.00
<b>175</b>	6/25/2010	copies			\$7.50	100%	\$7.50
<b>176</b>		TOTAL LEGAL FEES CLAIMED AS DAMAGES					<b>\$38,647.66</b>